

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Chapter 7 Estate of Bernard L.  
Madoff,

Plaintiff,

v.

STANDARD CHARTERED FINANCIAL  
SERVICES (LUXEMBOURG) S.A. (f/k/a  
AMERICAN EXPRESS FINANCIAL  
SERVICES (LUXEMBOURG) S.A. and f/k/a  
AMERICAN EXPRESS BANK  
(LUXEMBOURG) S.A.), as represented by its  
Liquidator HANSPETER KRÄMER,  
HANSPETER KRÄMER, in his capacities as  
liquidator and representative of STANDARD  
CHARTERED FINANCIAL SERVICES  
(LUXEMBOURG) S.A.,  
STANDARD CHARTERED BANK  
INTERNATIONAL (AMERICAS) LTD.,  
f/k/a AMERICAN EXPRESS BANK  
INTERNATIONAL, and STANDARD  
CHARTERED INTERNATIONAL (USA)  
LTD., and f/k/a AMERICAN EXPRESS  
BANK LTD.,

Defendants.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01565 (CGM)

**STIPULATION AND ORDER TO ADJOURN ARGUMENT DATE**

Plaintiff Irving H. Picard (the “Trustee”), trustee for the substantively consolidated liquidation proceeding of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–lll, and the chapter 7 estate of Bernard L. Madoff, and defendants Standard Chartered Financial Services (Luxembourg) S.A. (formerly known as American Express Financial Services (Luxembourg) S.A. and before that, known as American Express Bank (Luxembourg) S.A.); Standard Chartered Bank International (Americas) Ltd. (formerly known as American Express Bank International); and Standard Chartered Holdings Inc. (“SCHI”) (as successor to Standard Chartered International (USA) Ltd. (“SCIUSA”), which was formerly known as American Express Bank Ltd. (“Defendants,” and with the Trustee, the “Parties”), by and through their respective undersigned counsel, state as follows:

**WHEREAS**, in accordance with the Stipulation and Order entered on May 16, 2022, Defendants timely filed a Motion to Dismiss on July 15, 2022;

**WHEREAS**, Defendants timely filed a Notice of Hearing on the Motion to Dismiss for November 16, 2022;

**WHEREAS**, the Trustee timely filed Opposition to the Motion to Dismiss on September 15, 2022;

**WHEREAS**, the Defendants timely filed a reply on the Motion to Dismiss on October 17, 2022;

**WHEREAS**, the Parties agree to an adjustment of the schedule for the hearing date on the Motion to Dismiss;

**IT IS HEREBY STIPULATED AND AGREED**, by and between the Parties, and **SO ORDERED**, by the Court that Defendants hereby withdraw their Notice of Hearing for November 16, 2022, and the Motion to Dismiss shall be heard on December 14, 2022.

Dated: October 31, 2022  
New York, New York

By: /s/ Robertson D. Beckerlegge  
**BAKER & HOSTETLER LLP**  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
Robertson D. Beckerlegge  
Email: rbeckerlegge@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for  
the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Chapter 7  
Estate of Bernard L. Madoff*

By: /s/ Andrew J. Finn  
**SULLIVAN & CROMWELL LLP**  
125 Broad Street  
New York, New York 10004  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588  
Andrew J. Finn  
Email: finna@sullcrom.com

*Attorneys for Defendants*

**Dated: November 1, 2022**  
**Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris**  
**U.S. Bankruptcy Judge**